

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

TCF INVENTORY FINANCE, INC.
a Minnesota corporation

Plaintiff,

v.

AMERICAN RIVER RV, INC.,
a California corporation,

and

KHURRAM AHMAD,
an Individual,

Defendants.

No. 1:19-cv-616

Honorable Martha M. Pacold

Honorable Jeffrey Cummings

PLAINTIFF'S MOTION FOR ENTRY OF CONSENT JUDGMENT

Plaintiff TCF Inventory Finance, Inc. ("TCFIF") moves this Court for entry of a consent judgment against Khurram Ahmad in this case. In support thereof, TCFIF states as follows:

1. TCFIF and Ahmad have reached a settlement agreement in this case.
2. Pursuant to the terms of the settlement agreement, TCFIF requests entry of the Order and Consent Judgment agreed to between TCFIF and Ahmad, which is attached hereto as Exhibit A.

WHEREFORE, Plaintiff TCF Inventory Finance, Inc. respectfully requests that this Court enter an Order and Consent Judgment in this case in the form attached hereto as Exhibit A and grant such other and further relief as this Court deems proper.

Respectfully submitted,

/s/ William R. Bay

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CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2019, I filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties of record in this action.

/s/ William R. Bay